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July 19, 2022

HO CHI MINH CITY

VIA ECF

Honorable Sharon A. King Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Room 1050 Camden, NJ

Re: Reading Rock Northeast LLC v. William N. Russell III et al., No. 1:20-cv-5728

Dear Judge King:

We represent Plaintiff Reading Rock Northeast LLC. As Your Honor may recall, the parties are also involved in a related action in the United States District Court, Southern District of Ohio, captioned *MRB Russell v. Reading Rock Northeast, LLC*, docket number, 1:21-cv-00172.

On July 14, 2022, the Court in Ohio conducted a settlement conference, and the case was settled with payment due on or before August 7, 2022, from William Russell. The Court entered the following minute entry:

Minute entry for proceedings held before Judge Michael R. Barrett: Settlement Conference held on 07/14/2022; Stephen Weigand, along with William N. Russell, III, appeared for Plaintiff William N. Russell, III; Jeffrey Nye, along with Gordon Nelson, appeared for Defendant Reading Rock Northeast, LLC; the matter is settled; the parties shall follow up with the Court as discussed. (Court Reporter: Lisa Conley-Yungblut). (kkz)

Duane Morris

Honorable Sharon A. King July 19, 2022 Page 2

Given the status of the Ohio case, Reading Rock Northeast LLC respectfully requests a thirty-day continuance of the telephone conference scheduled for July 28th with this Court as Reading Rock will file dismissal papers by mid-August if payment is received as promised.

Respectfully submitted,

/s/ Patrick J. Kearney

Patrick J. Kearney

PJK/dea

cc: All counsel of record